

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE PFIZER INC. SHAREHOLDER
DERIVATIVE LITIGATION

No. 09-CV-7822 (JSR)

ECF CASE

**NOTICE OF PLAINTIFFS' MOTION FOR FINAL APPROVAL OF DERIVATIVE
LITIGATION SETTLEMENT AND AWARD OF ATTORNEYS' FEES AND
REIMBURSEMENT OF EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law In Support of Plaintiffs' Motion for Final Approval of Derivative Litigation Settlement and Award of Attorneys' Fees and Reimbursement of Expenses, the Affidavit of Jeffrey N. Gordon in Support of Plaintiffs' Motion for Final Approval of Derivative Action Settlement, and the Joint Declaration of Mark Lebovitch and David Wales, Plaintiffs in the above-captioned shareholder derivative litigation, will move this Court before the Honorable Jed S. Rakoff on March 7, 2011 at 4:00 p.m. at the United States District Court for the Southern District of New York, 500 Pearl Street, New York, NY 10007, for entry of an Order approving the proposed final settlement of this Litigation (the "Settlement") and awarding attorneys' fees and reimbursement of expenses.

For the reasons set forth in Plaintiffs' Memorandum of Law, the Affidavit of Jeffrey N. Gordon and the Joint Declaration of Mark Lebovitch and David Wales, Plaintiffs respectfully request that the Court approve the Settlement and approve the requested attorneys' fees and expenses.

DATED: February 7, 2011

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